IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

Plaintiff,

Civil No. 23-1392 (SCC)

v.

2018 BUGATTI CHIRON (VIN#: VF9SP3V34JM795083),

Defendants in rem.

CLAIM TO DEFENDANT PROPERTY BY KEVIN THOBIAS

Claimant Kevin Thobias ("Claimant"), pursuant to Rule G(5)(a) of Supplemental Rules for Admiralty or Maritime Claims, hereby files a claim for the defendant property and states as follows:

I. CLAIM

- 1. Claimant is the sole owner and designated officer of Golden Exotics, LLC, a Montana limited liability company ("Company").
- 2. Company is the true and lawful owner of the above-captioned 2018 BUGATTI CHIRON (VIN#: VF9SP3V34JM795083) ("Vehicle") that was seized on or about June 1, 2023, at the Port of Miami, Miami, Florida.
- 3. Claimant hereby contests forfeiture, demands restitution and makes a claim to the Vehicle.

II. VERIFICATION

I, Kevin Thobias, pursuant to and with knowledge of the penalties for perjury provided by 28 U.S.C. §1746 do hereby declare under penalties of perjury that I have read the forgoing claim and such claim is true and accurate to the best of my knowledge and belief.

Executed on this 14th day of September of 2023.

Kevin Thobias

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, on September 14, 2023.

WE HEREBY CERTIFY that we electronically filed the instant claim using the CM/ECF

System, which will send notification to all counsel of record.

Counsel for Claimant:

/s/ Jonathan Edderai

Jonathan Edderai

Pro Hac Vice Pending

Florida Bar No. 124350

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